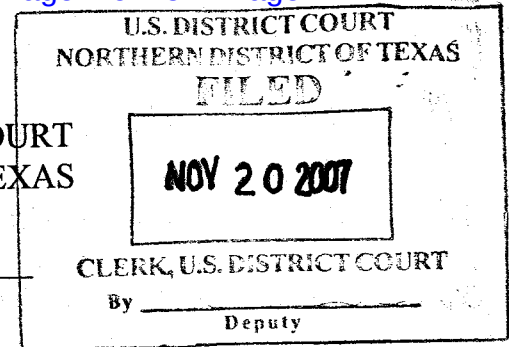


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION



UNITED STATES OF AMERICA

V.

WARREN D. MCDONALD (1)
BARBARA WILLIAMS-GLOVER (2)
CHRISTOPHER HUGHES (3)

§
§
§
§
§
§

NO. 2-07-CR-131

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Commit Mail Fraud and Aggravated Identity Theft
(18 U.S.C. § 371)

From on or about June 11, 2006, to on or about September 20, 2006, in the
Amarillo Division of the Northern District of Texas, and elsewhere, **Warren D.
McDonald, Barbara Williams-Glover, and Christopher Hughes**, defendants, willfully,
knowingly, and unlawfully conspired, confederated, and agreed with each other and other
persons known and unknown to the grand jury to commit certain offenses against the
United States, to wit: Mail Fraud, in violation of 18 U.S.C. § 1341, and Aggravated
Identity Theft, in violation of 18 U.S.C. § 1028A.

I. The Scheme

A. At all times material to this indictment:

1. The Federal and State Unemployment Insurance System was a

program administered by the Texas Workforce Commission (TWC).

2. Lance Blue Construction and Asphalt Co. (LBCAC) was a fictitious company created by **Warren D. McDonald** for the purpose of defrauding the TWC.

B. In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendants devised a scheme and artifice to defraud and deprive the TWC, the State of Texas, and the United States of monies in the form of unemployment benefits to which the defendants were not entitled. It was part of the scheme and artifice to defraud that:

1. Using the fictitious employee name Lance Blue Construction and Asphalt Co., **Warren D. McDonald** established a tax account with the TWC and reported false wage credits for six social security numbers. Three of the social security numbers were stolen from other persons.

2. **McDonald** would file unemployment claims against LBCAC using 1) names and social security numbers which he (**McDonald**) stole from innocent persons, 2) his (**McDonald's**) own social security number, and 3) the social security numbers of **Barbara Williams-Glover and Christopher Hughes** which were willingly provided to **McDonald** by **Williams-Glover and Hughes**.

3. The fraudulent claims caused TWC to issue unemployment checks in

the names of the claimants and place them in the U. S. mail for delivery to the claimant. The claims were mailed to addresses provided by **McDonald** when he made the claim. The addresses were Post Office boxes and mail boxes over which **Warren D. McDonald, Barbara Williams-Glover, and Christopher Hughes** exercised control.

4. **McDonald, Williams-Glover, and Hughes** would retrieve the unemployment checks from the mailboxes and cash them.

II. Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, set forth as substantive Counts Two through Twenty-Six, were committed in the Amarillo Division of the Northern District of Texas, and elsewhere.

In violation of 18 U.S.C. § 371.

Counts Two - Eleven
 Mail Fraud
 (18 U.S.C. § 1341)

The scheme set forth in Count One of the indictment is realleged.

On or about the dates listed below, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Warren D. McDonald**, defendant, for the purpose of executing the scheme and artifice to defraud described in Count One of this indictment, willfully and knowingly caused to be delivered by the United States Postal Service, according to the directions thereon, mail matter, that is, envelopes containing unemployment checks issued by the Texas Workforce Commission, as listed below:

Count	Date	Check #	Amount	Payee/Addressee	Address on Envelope
2	6/28/06	246804298	\$350.00	Warren D. McDonald	3106 Woodland St. Amarillo, TX 79103
3	7/12/06	246896553	\$1,050.00	Warren D. McDonald	3106 Woodland St. Amarillo, TX 79103
4	7/26/06	246994606	\$700.00	Warren D. McDonald	3106 Woodland St. Amarillo, TX 79103
5	8/9/06	247090823	\$700.00	Warren D. McDonald	3106 Woodland St. Amarillo, TX 79103
6	8/21/06	247162886	\$700.00	Warren D. McDonald	P.O. Box 1648 Fritch, TX 79036
7	9/5/06	247257709	\$700.00	Warren D. McDonald	P.O. Box 1648 Fritch, TX 79036
8	7/24/06	246973618	\$350.00	Robert S. Andrews	3106 Woodland St. Amarillo, TX 79103
9	8/7/06	247069831	\$1,050.00	Robert S. Andrews	3106 Woodland St. Amarillo, TX 79103
10	8/21/06	247164787	\$700.00	Robert S. Andrews	P.O. Box 1648 Fritch, TX 79036

Count	Date	Check #	Amount	Payee/Addressee	Address on Envelope
11	9/5/06	247260618	\$700.00	Robert S. Andrews	P.O. Box 1648 Fritch, TX 79036

All in violation of 18 U.S.C. § 1341.

Counts Twelve - Seventeen
 Mail Fraud; Aiding and Abetting
 (18 U.S.C. §§ 1341 and 2)

The scheme set forth in Count One of the indictment is realleged.

On or about the dates listed below, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Warren D. McDonald and Barbara Williams-Glover**, defendants, aided and abetted by one another, for the purpose of executing the scheme and artifice to defraud described in Count One of this indictment, willfully and knowingly caused to be delivered by the United States Postal Service, according to the directions thereon, mail matter, that is, envelopes containing unemployment checks issued by the Texas Workforce Commission, as listed below:

Count	Date	Check #	Amount	Payee/Addressee	Address on Envelope
12	6/29/06	246810579	\$350.00	Barbara Williams	3106 Woodland St. Amarillo, TX 79103
13	7/13/06	246902986	\$1,050.00	Barbara Williams	3106 Woodland St. Amarillo, TX 79103
14	7/27/06	247000943	\$700.00	Barbara Williams	3106 Woodland St. Amarillo, TX 79103
15	8/10/06	247097085	\$700.00	Barbara Williams	3106 Woodland St. Amarillo, TX 79103
16	8/24/06	247190435	\$350.00	Barbara Williams	3106 Woodland St. Amarillo, TX 79103
17	9/7/06	247277050	\$700.00	Barbara Williams	3106 Woodland St. Amarillo, TX 79103

All in violation of 18 U.S.C. §§ 1341 and 2.

Counts Eighteen - Twenty-Four
 Mail Fraud; Aiding and Abetting
 (18 U.S.C. §§ 1341 and 2)

The scheme set forth in Count One of the indictment is realleged.

On or about the dates listed below, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Warren D. McDonald and Christopher Hughes**, defendants, aided and abetted by one another, for the purpose of executing the scheme and artifice to defraud described in Count One of this indictment, willfully and knowingly caused to be delivered by the United States Postal Service, according to the directions thereon, mail matter, that is, envelopes containing unemployment checks issued by the Texas Workforce Commission, as listed below:

Count	Date	Check #	Amount	Payee/Addressee	Address on Envelope
18	7/11/06	246880128	\$219.00	Christopher Hughes	2800 Lometa Dr., Apt. 116 Amarillo, TX 79109
19	7/12/06	246891402	\$657.00	Christopher Hughes	2800 Lometa Dr., Apt. 116 Amarillo, TX 79109
20	7/26/06	246989345	\$438.00	Christopher Hughes	2800 Lometa Dr., Apt. 116 Amarillo, TX 79109
21	8/9/06	247085527	\$438.00	Christopher Hughes	2800 Lometa Dr., Apt. 116 Amarillo, TX 79109
22	8/21/06	247157901	\$438.00	Christopher Hughes	2800 Lometa Dr., Apt. 116 Amarillo, TX 79109

Count	Date	Check #	Amount	Payee/Addressee	Address on Envelope
23	9/6/06	247265323	\$438.00	Christopher Hughes	2800 Lometa Dr., Apt. 116 Amarillo, TX 79109
24	9/20/06	247357240	\$438.00	Christopher Hughes	2800 Lometa Dr., Apt. 116 Amarillo, TX 79109

All in violation of 18 U.S.C. §§ 1341 and 2.

Count Twenty-Five
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

From on or about June 11, 2006, to on or about September 20, 2006, within the Amarillo Division of the Northern District of Texas, and elsewhere, the defendant, **Warren D. McDonald**, did, without lawful authority, knowingly possess and use a means of identification of another person, to wit, a Social Security number belonging to Robert S. Andrews, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, mail fraud, in violation of 18 U.S.C. § 1341.

In violation of 18 U.S.C. § 1028A(a)(1).

Count Twenty-Six
Aggravated Identity Theft; Aiding and Abetting
(18 U.S.C. §§ 1028A(a)(1) and 2)

From on or about June 11, 2006, to on or about September 20, 2006, within the Amarillo Division of the Northern District of Texas, and elsewhere, the defendants, **Warren D. McDonald and Barbara Williams-Glover**, aided and abetted by one another, did, without lawful authority, knowingly possess and use a means of identification of another person, to wit, a Social Security number belonging to Neal Williams, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, mail fraud, in violation of 18 U.S.C. § 1341.


In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

Count Twenty-Seven
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

From on or about June 11, 2006, to on or about September 20, 2006, within the Amarillo Division of the Northern District of Texas, and elsewhere, the defendant, **Warren D. McDonald**, did, without lawful authority, knowingly possess and use a means of identification of another person, to wit, a Social Security number belonging to Zenobia Williams Jones, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, mail fraud, in violation of 18 U.S.C. § 1341.

In violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL


FOREPERSON

RICHARD B. ROPER
UNITED STATES ATTORNEY



VICKI LAMBERSON
Assistant United States Attorney
Texas State Bar No. 02975990
1205 Texas Avenue, Suite 700
Telephone: 806.472.7351
Facsimile: 806.472.7394
E-Mail: vicki.lamberson@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

THE UNITED STATES OF AMERICA

V.

WARREN D. MCDONALD (1); BARBARA WILLIAMS-GLOVER (2);
CHRISTOPHER HUGHES (3)

INDICTMENT

18 U.S.C. § 371
Conspiracy to Commit Mail Fraud and Aggravated Identity Theft
18 U.S.C. § 1341
Mail Fraud
18 U.S.C. §§ 1341 and 2
Mail Fraud and Aiding and Abetting
18 U.S.C. § 1028A(a)(1)
Aggravated Identity Theft
18 U.S.C. §§ 1028A(a)(1) and 2
Aggravated Identity Theft and Aiding and Abetting
(27 Counts)

A true bill rendered:

AMARILLO

Filed in open court this 20th day of Nov., A.D., 2007.

Sharon Sauls

Deputy Clerk

WARRANTS to issue for each Defendant.

UNITED STATES DISTRICT JUDGE

No Pending Criminal Complaint

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No
Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____
Search Warrant Case Number _____
R 20 from District of _____
Magistrate Case Number _____

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

Defendant Name: WARREN D. MCDONALD

Alias Name:

Address:

2-07-CR-131

County in which offense was committed: Potter

2. U.S. Attorney Information

AUSA LAMBERSON, Vicki

Bar # 10081500

3. Interpreter

☐ Yes ☒ No If Yes, list language and/or dialect:

4. Location Status

Arrest Date:

☐ Already in Federal Custody as of _____, in Amarillo, TX
☐ Already in State Custody
☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 27 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
18 USC 371	Conspiracy to Commit Mail Fraud & Aggravated Identity Theft	1 (1)
18 USC 1341	Mail Fraud	2-11 (10)
18 USC 1341 & 2	Mail Fraud; Aiding & Abetting	12-24 (13)
18 USC 1028A(a)(1)	Aggravated Identity Theft	25 & 27 (2)
18 USC 1028A(a)(1) & 2	Aggravated Identity Theft; Aiding & Abetting	26 (1)

Date 11-14-07

Signature of AUSA: 

Case 2:07-cr-00131-J-BB Document 1 Filed 11/20/07 Page 14 of 15 PageID 14

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number _____

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

Defendant Name: BARBARA WILLIAMS-GLOVER

Alias Name:

Address:

2-07-CR-131

County in which offense was committed: Potter

2. U.S. Attorney Information

AUSA LAMBERSON, Vicki

Bar # 10081500

3. Interpreter

☐ Yes ☒ No If Yes, list language and/or dialect:

4. Location Status

Arrest Date:

☐ Already in Federal Custody as of _____, in Amarillo, TX
☐ Already in State Custody
☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 8

☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
18 USC 371	Conspiracy to Commit Mail Fraud & Aggravated Identity Theft	1 (1)
18 USC 1341 & 2	Mail Fraud; Aiding & Abetting	12-17 (6)
18 USC 1028A(a)(1) & 2	Aggravated Identity Theft; Aiding & Abetting	26 (1)

Date

11-14-07

Signature of AUSA:



Case 2:07-cr-00131-J-BB Document 1 Filed 11/29/07 Page 15 of 15 PageID 15

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Related Case Information

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number _____

Defendant Name: CHRISTOPHER HUGHES

Alias Name:

Address:

2-07-CR-131

County in which offense was committed: Potter

2. U.S. Attorney Information

AUSA LAMBERSON, Vicki Bar # 10081500

3. Interpreter

☐ Yes ☒ No If Yes, list language and/or dialect:

4. Location Status

Arrest Date:

☐ Already in Federal Custody as of _____, in Amarillo, TX
☐ Already in State Custody
☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 8 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
18 USC 371	Conspiracy to Commit Mail Fraud & Aggravated Identity Theft	1 (1)
18 USC 1341 & 2	Mail Fraud; Aiding & Abetting	18-24 (7)

Date 11-14-07

Signature of AUSA: [Signature]